

Exhibit 2

From: [Joe Hellerstein](#)
To: [Mgaloblishvili, Leila](#)
Cc: [Rosenthal, Jeffrey A.](#); [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Levander, Samuel](#); [Saenz, Andres](#); [Everton, Olivia](#)
Subject: RE: PRIVILEGE AND CONFIDENTIAL
Date: Monday, November 29, 2021 2:05:36 AM

Leila:

We have and are continuing to use our best efforts to comply with the subpoena. We are not required to answer all your irrelevant, follow-up questions. Mr. Blackstock's residence is not relevant. All the documents you mention do not exist, have not been located or are located in the files sent to you. Did you review all the files before sending the email below? In light of the fact that you are well aware of our limited resources, this seems like an attempt to badger Mr. Blackstock or make us look bad in front of the Magistrate Judge.

Joe

From: [Mgaloblishvili, Leila](#)
Sent: Sunday, November 28, 2021 9:14 PM
To: [Joe Hellerstein](#)
Cc: [Rosenthal, Jeffrey A.](#); [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Levander, Samuel](#); [Saenz, Andres](#); [Everton, Olivia](#)
Subject: RE: PRIVILEGE AND CONFIDENTIAL

Joe,

Thank you for your response. We confirm receipt of two Dropbox files from Gregg Blackstock, and four 2017 emails and accompanying attachments from you regarding the modified organizational chart. We are reviewing these materials. However, you still have not responded to several of the issues raised in our November 26 letter, and have not provided a timeframe for producing the additional items which you have indicated are forthcoming but have not yet been produced.

First, you have not responded to our requests for:

- Current organizational charts for Perfectus Real Estate Corp. and Perfectus Real Estate Holdings, Inc.;
- Missing bank statements, including any statements for Perfectus's currently open account(s);
- The location of Mr. Blackstock; and
- Mr. Blackstock's availability for a deposition in New York between December 13-22 or in the first week of January.

In addition, please confirm when you expect to produce the materials you have identified below that are not covered by today's production. In particular, please confirm when you will be producing:

- Any correspondence that is not covered by the Dropbox set – which you note below "largely covers" the missing correspondence requested in Vale's subpoena;

- Board meeting minutes from Mr. Blackstock's time at the company;
- The "trial balance" for the 2019 and 2020 tax returns; and
- Additional responsive due diligence documents.

Lastly, the title of your Dropbox productions indicates that the BCLP files were provided to Proskauer between August 2020 and March 2021. Please clarify the reason for Perfectus's extended delay in producing these documents, all of which were provided to Perfectus – at the latest – over 8 months ago. Please also confirm whether these materials have been modified since they were received from BCLP or whether you are providing the full and unaltered set of documents that were provided by BCLP.

As noted in our letter of November 26 letter, it is imperative that you provide your response no later than Monday, November 29, in order for the December 2 letter to be the collaborative effort the Court expects.

Best regards,
Leila

Leila Mgaloblishvili

Cleary Gottlieb Steen & Hamilton LLP
One Liberty Plaza, New York NY 10006
T: +1 212 225 2607

lmgaloblishvili@cgsh.com | clearygottlieb.com

From: Joe Hellerstein <jzh@hellerstein-law.com>

Sent: Sunday, November 28, 2021 11:25 AM

To: Levander, Samuel <slevander@cgsh.com>

Cc: Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Mgaloblishvili, Leila <lmgaloblishvili@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Everton, Olivia <oeverton@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>

Subject: RE: PRIVILEGE AND CONFIDENTIAL

Sam:

Firstly, please note that the entire production is being conducted by one person. Perfectus does not have the financial means to pay anyone to do this work.

We will be sending two drop box links to the BCLP files that were prepared into .pdf and .txt files by Proskauer.

Please note the following addressing the points raised:

- (i) Missing correspondence, including in particular correspondence in the period around 2010 and 2018 – should be largely covered by the dropbox folders.

- (ii) Board meeting minutes. These should be in the dropbox folders – all prior to Mr. Blackstock’s time at the company.
- (iii) Current financial statements – Perfectus does not produce financial statements. As already indicated a trial balance will be prepared with the 2019 and 2020 tax returns. These cannot be prepared at present because of HFZ.
- (iv) Due diligence documents related to Perfectus’s real estate investments: already provided for 500 North Michigan Avenue. We have identified some additional responsive documents.
- (v) Various facially relevant spreadsheets and other attachments (including, for example, “Tarpley Cash Flow Projection 11171-v2.xlsx,” “20180305_Perfectus Real Estate Corporation Ownership Chart.pdf,” “Belnord projection V8 3-12-15.xlsx,” and “Tarpley Belnord Sale Ohad’s version of projection.xlsx”) referenced in the emails produced in our June 2021 production. - Some context to these documents might be added with the complete set of documents now added.
- (vi) Unredacted versions of the documents from your June 2021 production, or a corresponding privilege log. – All of these documents are in the complete set of documents provided in the dropbox files.
- (vii) “bank movements.xlsx,”: Found it in the documents that are provided in the dropbox files. No knowledge as to who prepared.
- (viii) On the organization chart. The source is the Belnord / HFZ Closing documents that were provided by Nir Meir. Mr. Blackstock believed the chart to be wrong and thus corrected it. We reject your characterization as “doctoring”. We will send emails which should provide some context.

From: [Levander, Samuel](#)

Sent: Friday, November 26, 2021 7:02 PM

To: jzh@hellerstein-law.com

Cc: [Rosenthal, Jeffrey A.](#); [Mgaloblishvili, Leila](#); [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Everton, Olivia](#); [Saenz, Andres](#)

Subject: RE: PRIVILEGE AND CONFIDENTIAL

Joe,

Please see the attached correspondence.

Best regards,

Sam

Samuel Levander

Cleary Gottlieb Steen & Hamilton LLP

Assistant: mdigiario@cgsh.com

One Liberty Plaza, New York NY 10006

T: +1 212 225 2951

slevander@cgsh.com | clearygottlieb.com

From: jzh@hellerstein-law.com <jzh@hellerstein-law.com>

Sent: Monday, November 22, 2021 12:35 PM

To: Levander, Samuel <slevander@cgsh.com>

Cc: Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Mgaloblishvili, Leila <imgaloblishvili@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Everton, Olivia <oeverton@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>

Subject: RE: PRIVILEGE AND CONFIDENTIAL

Please see attached bank statements.

This message is being sent from a law firm and may contain confidential or privileged information. If you are not the intended recipient, please advise the sender immediately by reply e-mail and delete this message and any attachments without retaining a copy.

Throughout this communication, "Cleary Gottlieb" and the "firm" refer to Cleary Gottlieb Steen & Hamilton LLP and its affiliated entities in certain jurisdictions, and the term "offices" includes offices of those affiliated entities. Our external privacy statement is available at: <https://www.clearygottlieb.com/footer/privacy-statement>

This message is being sent from a law firm and may contain confidential or privileged information. If you are not the intended recipient, please advise the sender immediately by reply e-mail and delete this message and any attachments without retaining a copy.

Throughout this communication, "Cleary Gottlieb" and the "firm" refer to Cleary Gottlieb Steen & Hamilton LLP and its affiliated entities in certain jurisdictions, and the term "offices" includes offices of those affiliated entities. Our external privacy statement is available at: <https://www.clearygottlieb.com/footer/privacy-statement>